

**STATE OF VERMONT
BOARD OF MEDICAL PRACTICE**

In Re:)	
Stephanie H. Taylor, M.D.,)	Docket Nos. MPS 45-0304, <i>et al.</i>
Respondent)	

RESPONDENT'S REQUEST FOR PRODUCTION OF DOCUMENTS

NOW COMES STEPHANIE H. TAYLOR, M.D., respondent, by and through her attorney, Peter G. Anderson, Esq., of Stowe, Vermont, and requests that the Vermont Board of Medical Practice produce for inspection and copying, on or before 30 days from the filing hereof, the following documents:

1. All documentation from Copley Hospital in Morrisville, Vermont, concerning the care, treatment and/or prescribing of medication for "Patient B" on September 11, 2002, including, but not limited to, documentation reflecting Dr. Taylor's telephone call to the hospital on said date and documentation reflecting any conversations between a representative of the Vermont Board of Medical Practice and Dr. Kaeding of Copley Hospital;
2. All documentation concerning the care of "Patient B" by Dr. Theodore Butler, Sr. Vice President of Medical Affairs and Clinical Professor of Medicine at Tufts, including, but not limited to, notes from Patient B's office visit of November 1, 2002, notes from any conversations between a representative of the Vermont Board of Medical Practice and Dr. Butler regarding Dr. Taylor, and any documentation reflecting prescriptions written for "Patient B" by Dr. Butler;
3. All medical records from Hallmark Health System documenting all medical care received by "Patient B" during the time frame relevant to these charges;
4. All documentation obtained by the Vermont Board of Medical Practice from Walgreens Pharmacy pertaining to this action, including, but not limited to, the pharmacy reports for Walgreen Pharmacies located in Stoughton, MA and Malden, MA reflecting prescriptions

allegedly ordered by Dr. Taylor during 2002 and 2003, all supporting documentation for said pharmacy reports, and notes or reports reflecting any communications between a representative of the Vermont Board of Medical Practice and Walgreens regarding Dr. Taylor for purposes of this action;

5. All documentation obtained by the Vermont Board of Medical Practice from Brooks Drugs in Morrisville, VT pertaining to this action, including, but not limited to, the pharmacy reports for Brooks Drugs in Morrisville, reflecting prescriptions allegedly ordered by Dr. Taylor and or "Hallmark Health" in 2002, all supporting documentation for said pharmacy reports, and notes or reports documenting any communications between a representative of the Vermont Board of Medical Practice and Brooks Drugs regarding Dr. Taylor for purposes of this action;

6. All documentation obtained by the Vermont Board of Medical Practice from Heritage Drug in Stowe, Vermont, including, but not limited to, the Pharmacy Report reflecting the alleged activity of S. Taylor from 1/01/02 through 3/24/04, all supporting documentation for said pharmacy reports, and notes or reports documenting any communications between a representative of the Vermont Board of Medical Practice and Heritage Drug regarding Dr. Taylor for purposes of this action;

7. All documentation obtained by the Vermont Board of Medical Practice from CVS Pharmacy in Stoughton, MA, including, but not limited to, the Pharmacy Report reflecting the alleged activity of Dr. Taylor on November 15, 2002 and all supporting documentation for said pharmacy report;

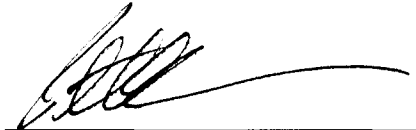
8. Copies of all actual prescriptions written by Dr. Taylor, received by the Vermont Board of Medical Practice on June 30, 2004 from Investigator Spinale of the Massachusetts Board of Registration in Medicine;

9. Copies of all medical records from Hallmark Health System reflecting treatment of "Patient C" received by the Vermont Board of Medical Practice;

10. All witness statements that have been obtained for purposes of this action;

11. All documentation obtained from the Vermont Practitioner Health Program regarding Dr. Taylor including any documentation reflecting communications between the Vermont Board of Medical Practice and Vermont Practitioner Health Program regarding Dr. Taylor for purposes of this action.

Dated at Stowe, Vermont, this 21st day of October, 2004.



PETER G. ANDERSON, ESQ.
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